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VIA ECF

The Honorable Cathy Seibel, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street, Courtroom 621
White Plains, NY 10601-4150

Re: General Electric Company v. Gas Turbine Controls Corporation; Case No. 17-cv-7188 (CS)

Dear Judge Seibel:

We represent defendant Gas Turbine Controls Corporation ("GTC") in the above-captioned matter, and we submit this letter with respect to the deadline to answer, move, or otherwise respond to the Complaint in this action, which was filed on September 21, 2017. Since GTC was served, it and plaintiff General Electric Company ("GE") have been discussing the allegations in the case in an effort to shed light on the basis for suit and to reach a mutual understanding of the facts. To allow for this, GE has offered a series of short, two-week extensions of time, which GTC has been required to extend each time – heretofore with consent from GE – given the nature of the discussions.

GTC reached out to GE last Wednesday, eight business days into the most recent extension period, to propose a meeting with the business principals. While the parties were in touch over the Thanksgiving holiday, the holiday made connecting difficult. At 4:29 p.m. this afternoon, GE informed us that it rejected the proposal, and that it would not agree to any further extensions.

The deadline to answer or move falls today. Given the sudden shift in the parties' posture, GTC requires two weeks to turn its attention to its defense of the claims, including evaluation of affirmative defenses and counterclaims. While this is the fourth request for an extension of time, GTC respectfully submits that good cause exists to permit it to reallocate its resources from settlement to litigation.

We apologize for the unavoidably late filing of this request, and we thank the Court for its consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "E. M. Lackman", written over a horizontal line.

Eleanor M. Lackman

cc: All counsel of record (via ECF)